CJB/KSH

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

FILED IN OPEN COURT

UNITED STATES OF AMERICA

* CRIM. NO. 22-cr- 040-31

v. * 1

USAO NO. 22R00131

MIKAYLA SCHEELE

a.k.a. "Mikayla Riviera"

* VIOLATION: * 18 U.S.C. § 371

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE Conspiracy to Commit an Offense Title 18, United States Code, Section 371

1. Beginning before May 27, 2021, and continuing at least through on or about June 11, 2021, in the Southern District of Alabama, and elsewhere, the defendant,

MIKAYLA SCHEELE

did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with Jeffery Sikes, Sean Bottorff, Michael Bottorff, Quinton Olson, Alexander Olson, and others, to commit an offense against the United States, to-wit: to maliciously damage and destroy, and attempt to maliciously damage and destroy, by means of fire, real and personal property used in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

- 2. Specifically, **MIKAYLA SCHEELE** conspired to maliciously damage and destroy, and attempt to maliciously damage and destroy, by means of fire, the following real properties and the personal and real properties contained therein:
 - a. Walmart Supercenter # 991 located at 101 East I-65 Service Road South, Mobile, Alabama, 36606;
 - b. Walmart Supercenter # 866 located at 5245 Rangeline Service Road South, Mobile, Alabama, 36619;

- c. Walmart Supercenter #969 located at 9350 Highway 49, Gulfport, Mississippi, 39503; and
- d. Walmart Supercenter #1088 located at 2681 Switzer Drive, Biloxi, Mississippi, 39531.

OBJECTIVE OF THE CONSPIRACY

3. The objective of this conspiracy was to affect interstate and foreign commerce by maliciously setting fires to damage and destroy Walmart stores and property within them. Specifically, the fires were maliciously set to force Walmart, Inc. to meet specific demands related to interstate and foreign commerce.

MANNER AND MEANS OF THE CONSPIRACY

4. To achieve the conspiracy's objective, MIKAYLA SCHEELE and other coconspirators maliciously set fires inside four Walmart stores during regular business hours while customers, vendors, and employees were present inside and outside the stores.

OVERT ACT

- 5. To carry out, and in furtherance of, the manner and means of this conspiracy, the conspirators committed numerous overt acts, including, but not limited to the following:
 - a. On or about May 28, 2021, MIKAYLA SCHEELE maliciously lit a fire in the hardware section of Walmart Supercenter # 866 located on Rangeline Road in Mobile.

All in violation of Title 18, United States Code, Section 371.

SEAN P. COSTELLO

SOUTHERN DISTRICT OF ALABAMA

aseoHeisterhage